

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:)
ANDREA HOWELL,) CASE NO.: **19-45665-399**
)
) Chapter **13**
Debtor.)
) Response Due: **10/07/2021**

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS
FOR FAILURE TO MAKE PLAN PAYMENTS AND NOTICE

COMES NOW Debtor, by and through her attorney, and for her Answer to Trustee's Motion to Dismiss for Failure to Make Plan Payments, states as follow:

1. Debtor admits the allegations of Paragraph 1.
2. Debtor admits the allegations of Paragraph 2.
3. Debtor denies the allegations of Paragraph 3.
4. Debtor denies the allegations of Paragraph 4.
5. Debtor denies the allegations of Paragraph 5.

WHEREFORE, Debtor requests the Court to deny the motion, set it for hearing, and to make any other orders which the Court may find to be just.

Respectfully submitted,

Timothy P. Powderly

/s/Timothy P. Powderly

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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon the following electronically through the CM/ECF system of the court on September 17, 2021 to:

Diana S. Daugherty
standing_trustee@ch13stl.com, trust33@ch13stl.com

/s/ Timothy P. Powderly

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